

UNITED STATES DISTRICT COURT
Southern District of Florida

Lymus L. Brown III

Plaintiff(s)

v.

M. Lisanti, book

Defendant(s)

00-6001
CASE NO.

CIV - GOLD

cat / d.v. B-Browna REGISTRAR JUDGE
Case # 0:00cv1600/SORRENTINO
Judge GOLD Mag CHS
Motn lfp Y/S Fee pd \$ 10
Receipt # _____

CIVIL RIGHTS COMPLAINT

COMES NOW, the Plaintiff(s) in Pro-Se form Lymus Brown

_____ and sues the above listed Defendant(s) in their individual and official capacity as designated law enforcement officials.

That the Defendant(s) in this cause have in fact violated the Plaintiff(s) well established constitutional rights in a wanton and willful manner, and that the Defendant(s) have all acted under the color of state law, giving this court Jurisdiction under the following:

(28 USC 1331) (42 USC 1983)

(28 USC 1343) (28 USC 1441) (28 USC 1915)

CP

Defendant(s) can be located at:

M. Lisanti 555 Southeast 1st Avenue
Fort Lauderdale, Fla, 33310

Plaintiff(s) can be located at:

Lymes Levarr Brown # 555 Southeast 1st Avenue
Fort Lauderdale, Fla 33310.

STATEMENT OF FACTS

- ① That on November 22, 1999 at approx. 07:45 hours I Lymus Leverr Bizon was placed into an isolation cell away from co-defendants by one Deputy D. Crow.
- ② That on November 22, 1999 at approx. 08:03 Hours I Lymus Bizon was removed from an isolation cell by one Deputy M. Lisanti.
- ③ That the plaintiff told the said defendant Deputy M. Lisanti, that there were keep separates between one Randy Garland, Cameron Tyndell and himself.
- ④ That on said date at approx. 08:03 hours I was placed into an court holding cell with co-defendants and keep separates from by M. Lisanti.
- ⑤ That the said defendant ignored the plaintiff and placed him in the cell with the keep separate inmates.
- ⑥ That in the result of the defendants actions, the said plaintiff was brutally assaulted by one Randy Garland and Cameron Tyndell.
- ⑦ That as a result of the actions of the said defendant, the said plaintiff was injured by one Cameron Tyndell and one Randy Garland.
- ⑧ That as a result of the actions of the said defendant, the said plaintiff suffered injury to his ribs, lower back and scarring to the left ear.

① That as an result of the defendants actions, the plaintiff suffer
consistant pain in head area, back area, rib area and brief periods
of memory loss.

CAUSE OF ACTION

1. That the Defendant(s) in this action have violated the Plaintiff(s) well established constitutional rights.
2. That the Defendant(s) have acted in a wanton and willful disregard to the Plaintiff(s) well established constitutional rights.
3. That the Defendant(s) have violated the Plaintiff(s)
_____ ^{8 + 11} amendments.
4. That the Defendant(s) have all of them acted under the color of state law.
5. That what the Defendant(s) done was of a deliberate indifference.
6. That what the Defendant(s) have in fact done to the Plaintiff(s) was shocking to the mind and caused incontrovertible damage to the Plaintiff(s) minds.
7. That the Defendant(s) knew or should have known that they were violating the Plaintiff(s) well established constitutional rights.

Relief Requested Injunctive Relief Requested

1. Cite what you would like the court to order the defendants to do.
2. That the court should order the defendants to refrain from any type of retaliation against the plaintiff(s)
3. That the court should issue a temporary restraining order against the defendants to.

ensure the safety of the Plaintiff(s).

MONETARY DAMAGES

4. Cite how much money you would like the Defendant(s) to pay the Plaintiff(s).
5. Monetary damages in the amount of \$ 180,000 from each of the Defendant(s) to the Plaintiff(s).
6. Punitive damages in the amount of \$ 180,000 from each of the Defendant(s) to the Plaintiff(s).
7. That the court should order the Defendant(s) to pay any and all court costs in this case.

VERIFICATION

STATE OF FLORIDA

COUNTY OF _____

That the Plaintiff(s) being first duly sworn under oath says that they are the Plaintiff(s) in this action and know the content of the complaint. That it is true and correct of his own knowledge except to those matters that are stated on his information and belief, and as to those matters he believes to be true and correct

*I declare under the penalty of perjury
that the foregoing complaint is true and
correct.*



WITNESS my hand and seal in the County and State last aforesaid this ____ day of

_____, 1999.

NOTARY PUBLIC, State of Florida
Commission Expires